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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

BRIDGETTE DAVIS, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

SHUTTERSTOCK, INC., a Delaware
corporation; and DOES 1 to 10, inclusive,

Defendants.

Case No. 2:23-cv-01241-DJC-SCR

**STIPULATION AND ORDER
EXTENDING CLASS
CERTIFICATION DEADLINES**

Judge: Hon. Daniel J. Calabretta
Ctmm: 7, 14th Floor

STIPULATION

Plaintiff Bridgette Davis (“Plaintiff”) and Defendant Shutterstock, Inc. (“Defendant”) (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, on August 15, 2024, Defendant filed an Answer to Plaintiff’s Second Amended Complaint (Dkt. 33);

WHEREAS, on October 23, 2024, this Court issued a Scheduling Order establishing the deadlines for Plaintiff’s motion for class certification and related briefing (Dkt. 42);

WHEREAS, the Parties have been actively involved in discovery since the Scheduling Order was issued, including exchanging written discovery and producing responsive documents, with Defendant’s first production of documents occurring on January 15, 2025, and Plaintiff’s first production of documents occurring on February 26, 2025;

WHEREAS, in connection with their responses to written discovery, the Parties have met and conferred on several occasions to address discovery disputes and have successfully resolved such disputes without court intervention;

WHEREAS, Defendant has continued to produce responsive documents and, following a meet and confer with Plaintiff’s counsel on March 22, 2025, agreed to collect, review, and produce internal communications responsive to certain of Plaintiff’s discovery requests;

WHEREAS, on April 2, 2025, Plaintiff served a deposition notice on Defendant pursuant to Federal Rule of Civil Procedure 30(b)(6) requesting that such deposition occur on April 29, 2025;

WHEREAS, following additional discussions between counsel during the week of April 7, 2025 concerning the status of document production and Plaintiff’s 30(b)(6) deposition of Defendant, Defendant has agreed to and is prepared to complete its production of documents responsive to Plaintiff’s pending discovery requests, including internal communications, by April 30, 2025;

WHEREAS, to ensure Plaintiff has time to review such documents prior to the 30(b)(6)

1 deposition of Defendant, and that Defendant has sufficient time to prepare its 30(b)(6) witness to
2 testify regarding such documents, and considering the availability of Defendant's 30(b)(6) witness
3 and counsel, the Parties have agreed that the 30(b)(6) deposition of Defendant should be conducted
4 on May 29, 2025;

5 WHEREAS, in light of the Parties agreement to conduct the 30(b)(6) deposition of
6 Defendant at the end of May following Defendant's final production of documents responsive to
7 Plaintiff's pending discovery requests, and to ensure that Plaintiff is able to complete the 30(b)(6)
8 deposition of Defendant sufficiently in advance of the deadline for her Motion for Class
9 Certification, the Parties agree that a four-week extension to the briefing schedule for Plaintiff's
10 motion for class certification is warranted, will not prejudice either side, and will promote
11 efficiency;

12 WHEREAS, the requested continuance of the class certification briefing schedule is
13 narrowly tailored, supported by good cause, and will facilitate the completion of class certification-
14 related discovery in a manner that is fair to all Parties and consistent with the orderly progression
15 of this case;

16 WHEREAS, the Parties previously stipulated to or requested the following extensions,
17 none of which related to the deadline for Plaintiff's motion for class certification:

- 18 • July 18, 2023 (Dkt. 7): stipulation pursuant to Local Rule 143 to extend the time
19 for Defendant to file a responsive pleading;
- 20 • July 24, 2023 (Dkt. 8): amendment to the Parties' stipulation pursuant to Local
21 Rule 143 to extend the time for Defendant to file a responsive pleading;
- 22 • September 14, 2023 (Dkt. 19): stipulation to modify the briefing schedule for
23 Defendant's motion to dismiss, which was denied;
- 24 • August 20, 2024 (Dkt. 34): stipulation to continue the pretrial scheduling
25 conference, which was granted;

26 WHEREAS, the extension will have no effect on any case deadlines other than as specified
27 below;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Courts approval, that the case deadlines be modified as follows:

Event	Current Deadline	New Deadline
<ul style="list-style-type: none"> Deadline for Plaintiff to file the motion for class certification and any expert reports in support thereof 	May 30, 2025	June 27, 2025
<ul style="list-style-type: none"> Deadline for Defendant to file its opposition to Plaintiff's motion for class certification and any expert reports in support thereof Deadline for Defendant to file any <i>Daubert</i> motions to exclude Plaintiff's expert testimony 	July 29, 2025	August 27, 2025
<ul style="list-style-type: none"> Deadline for Plaintiff to file reply in support of Plaintiff's motion for class certification Deadline for Plaintiff to file any <i>Daubert</i> motions to exclude Defendant's expert testimony Deadline for Plaintiff to file oppositions to any <i>Daubert</i> motions filed by Defendant 	August 28, 2025	September 25, 2025
<ul style="list-style-type: none"> Deadline for Defendant to file replies in support of any <i>Daubert</i> motions filed by Defendant Deadline for Defendant to file oppositions to any <i>Daubert</i> motions filed by Plaintiff 	September 18, 2025	October 16, 2025
<ul style="list-style-type: none"> Deadline for Plaintiff to file any replies in support of <i>Daubert</i> motions filed by Plaintiff 	October 2, 2025	October 30, 2025
<ul style="list-style-type: none"> Hearing on motion for class certification 	October 16, 2025	November 13, 2025, or any date thereafter at the Court's discretion

1 **IT IS SO STIPULATED:**

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3 Dated: April 11, 2025

JENNER & BLOCK LLP

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5
6 By: /s/ Kate T. Spelman

7 Kate T. Spelman
8 Alison I. Stein (pro hac vice)
9 Kristen Green

10 *Attorneys for Defendant*
11 *Shutterstock, Inc.*

12
13 Dated: April 11, 2025

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 11, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE